

COHEN & GREEN

June 10, 2025

Hon. Denise Cote, U.S.D.J.
 United States District Court for the Southern District of New York
 500 Pearl Street
 New York, New York 100077

By Electronic Filing.

Re: Friedland et al. v. City of New York, et al., 24-cv-7064

Dear Judge Cote:

My firm, with co-counsel, represents Plaintiffs in the case above. I write to ask for an extension of 30 days to file an opposition to Defendants' motion to dismiss.

Per the Court's Individual Practice § 1(D): (1) the original due date is Friday, June 13, 2025, (2) this is the first extension, (3) whether these previous requests were granted or denied, and (4) Defendants only consent to 7 days, and their reasons provided have been: "I can agree to 7 days. I'm starting a trial on 6/30, and 2 weeks^[1] would make my Reply due right in the middle of it," and after an attempt to work around that trial, "We're only consenting to 7 days" without further elaboration.

Defendants' motion seeks dismissal of the entire case, and is premised primarily on a new argument not presented in their first motion (so much of the research already done on that first motion is not necessarily directly helpful). Defendants first sought — and the Court granted — a 60-day extension of time to respond to the Complaint (Plaintiffs agreed to 30 days, but were open to further extensions if they proved necessary). ECF Nos. 19 and 20. Defendants then sought, Plaintiffs consented to, and the Court granted, a 31-day second extension of time to respond. ECF Nos. 21 and 22.

As the attorney bottom-lining this motion, as I told counsel starting on June 6, I have an unusually busy collection of motions and appeal briefing and arguments in the next two weeks, have multiple instances of travel for oral arguments, and that heavy workload started about when Defendants filed their motion. I explained this to Defendants, and also — given their note that 14 days created a problem — offered to consent to and seek extra time for their reply (without moving the deadline for the opposition).

Particularly in light of the minimal time sought, the fact that this is the first extension, and the fact that the Court granted Defendants 90 days to respond to their complaint, Plaintiffs respectfully

^[1] Plaintiffs initially only asked Defendants for consent to 14 days. But because Defendants are not consenting to this extension, Plaintiffs are now asking for sufficient time to ensure no further extensions are necessary.

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request this first — and only (*see* n. 1 below) — 30 day extension.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/ them

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